

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

MARIA MASUCCI,

Plaintiff,

V.

NORMAN MINETA, Secretary,  
U.S. Department of Transportation,

Defendant.

Civil Action No. 04-12537 RGS

## JOINT MOTION FOR LEAVE TO EXTEND DISCOVERY DEADLINE

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, the parties jointly move for a two-month extension of the discovery cut-off and related dates. In support of the foregoing motion, the parties state as follows:

1. On February 22, 2006, this Court adopted the parties' Joint Statement Pursuant to Rule 16.1 in part, and set a schedule under which the parties were to complete all fact depositions and discovery by July 31, 2006; and file dispositive motions by September 1, 2006, with responses due 14 days thereafter unless enlarged by the Court.

2. The parties hereby request that these dates be continued by two months, to allow the parties to complete fact depositions and discovery. This request is necessary because the parties are unable to complete the depositions within the current schedule due to difficulties in coordinating the depositions around the summer vacation schedules of counsel and the witnesses, and the fact that two of the witnesses whom plaintiff wishes to depose no longer are employed by the federal government, and therefore have to be located before they are subpoenaed for depositions.

Accordingly, the parties now respectfully request that the schedule in this case be revised as follows:

- a. All fact depositions and discovery by **September 29, 2006.**
- b. Any dispositive motions to be filed by **November 1, 2006**  
unless enlarged by the Court.

WHEREFORE, with good cause having been shown, the parties respectfully request that this Court grant them a two-month extension of the discovery cut-off and related dates.

Respectfully submitted:

By the parties,

The Plaintiff,

The Defendant,

By Her Attorneys

By His Attorney

/s/ Michael J. Heineman  
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Dated: July 27, 2006